## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and ) on Behalf of All Others Similarly Situated,	Civil Action No. 3:16-cv-02267
, , , , , , , , , , , , , , , , , , ,	Honorable Aleta A. Trauger
Plaintiff, )	Magistrate Judge Jeffrey S. Frensley
vs.	
CORRECTIONS CORPORATION OF () AMERICA, et al., ()	DEMAND FOR JURY TRIAL
Defendants. )	

## [PROPOSED] AGREED ORDER EXTENDING PAGE LIMITATIONS FOR DISPOSITIVE MOTION BRIEFING

Lead Plaintiff Amalgamated Bank, as Trustee for the Longview Collective Investment Fund ("Plaintiff"), and Defendants CoreCivic, Inc., Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger and Harley G. Lappin ("Defendants," and collectively, with Plaintiff, the "Parties"), submit the following [Proposed] Agreed Order Extending Page Limitations For Dispositive Motions.

WHEREAS, the deadline for filing dispositive motions is November 20, 2020 (Dkt. No. 320);

WHEREAS, Local Rule 7.01(a) provides that memoranda and replies filed in connection with those dispositive motions may not exceed twenty-five (25) pages and five (5) pages, respectively, without leave of Court;

WHEREAS, given the complexity of the issues in this case, the Parties agree that a modest extension of the page limits set forth in Local Rule 7.01(a) is necessary for the Parties to fully brief the Parties' anticipated arguments; and

WHEREAS, the Parties have agreed that Defendants, collectively, shall file only one (1) dispositive motion, and Plaintiff shall file only one (1) dispositive motion;

NOW, THEREFORE, and subject to approval of the Court, the Parties agree that any memorandum in support of or in opposition to a dispositive motion shall not exceed thirty (30) pages and that any replies in further support of a dispositive motion shall not exceed fifteen (15) pages.

IT IS SO ORDERED.

ALETA A. TRAUGER United States District Judge

Agreed to and submitted by:

/s/ Steven A. Riley

Steven A. Riley (TN #6258)
Milton S. McGee, III (TN #024150)
RILEY WARNOCK & JACOBSON, PLC
1906 West End Avenue
Nashville, TN 37203
T: (615) 320-3700
F: (615) 320-3737
sriley@rwjplc.com
tmcgee@rwjplc.com

David J. Schindler (admitted pro hac vice)
Brian T. Glennon (admitted pro hac vice)
Meryn C. N. Grant (admitted pro hac vice)
LATHAM & WATKINS LLP
355 South Grand Ave., Suite 100
Los Angeles, CA 90071
T: (213) 485-1234
F: (213) 891-8763
david.schindler@lw.com
brian.glennon@lw.com
meryn.grant@lw.com

Morgan E. Whitworth (admitted pro hac vice) LATHAM & WATKINS LLP 505 Montgomery Street, Suite 2000 San Francisco, CA 94111 T: (415) 391-0600 F: (415) 395-8095 morgan.whitworth@lw.com

Sarah A. Tomkowiak (admitted *pro hac vice*) LATHAM & WATKINS LLP 555 Eleventh Street, NW, Suite 1000 Washington, DC 20004-1304 T: (202) 637-2335 F: (415) 637-2201 sarah.tomkowiak@lw.com

Attorneys for Defendants Corrections Corporation of America, Damon T. Hininger, David M. Garfinkle, Todd J. Mullenger, and Harley G. Lappin

/s/ Christopher M. Wood (w/permission)

Christopher Hamp Lyons
Christopher M. Wood
Robbins Geller Rudman & Dowd LLP
414 Union Street, Suite 900
Nashville, TN 37219
clyons@rgrdlaw.com
cwood@rgrdlaw.com

Dennis J. Herman
Willow E. Radcliffe
ROBBINS GELLER RUDMAN
& DOWD LLP
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
dennish@rgrdlaw.com
willowr@rgrdlaw.com

Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that service of the [Proposed] Agreed Order Extending Page Limitations for Dispositive Motion Briefing was made upon the following Filing Users through the Electronic Filing System:

Paul Kent Bramlett Robert Preston Bramlett BRAMLETT LAW OFFICES 40 Burton Hills Blvd., Suite 200 P.O. Box 150734 Nashville, TN 37215 pknashlaw@aol.com robert@bramlettlawoffices.com

Jeremy A. Lieberman
J. Alexander Hood II
Marc C. Gorrie
POMERANTZ LLP
600 Third Ave., 20th Floor
New York, NY 10016
jalieberman@pomlaw.com
ahood@pomlaw.com
mgorrie@pomlaw.com

Jerry E. Martin
BARRETT JOHNSTON MARTIN &
GARRISON, LLC
Bank of America Plaza
414 Union Street
Suite 900
Nashville, TN 37219
jmartin@barrettjohnston.com

Patrick V. Dahlstrom POMERANTZ LLP 10 South La Salle St., Suite 3505 Chicago, IL 60603 pdahlstrom@pomlaw.com

Michael Goldberg
Brian Schall
GOLDBERG LAW PC
1999 Avenue of the Stars
Suite 100
Los Angeles, CA 90067
michael@goldberglawpc.com
brian@goldberglawpc.com

Christopher T. Cain SCOTT & CAIN 550 W Main Avenue Suite 601 Knoxville, TN 37902 cain@scottandcain.com

James A. Holifield, Jr.
HOLIFIELD JANICH RACHAL &
ASSOCIATES, PLLC
11907 Kingston Pike
Suite 201
Knoxville, TN 37934
aholifield@holifieldlaw.com

Christopher Hamp Lyons
Christopher M. Wood
ROBBINS GELLER RUDMAN
& DOWD LLP
414 Union Street
Suite 900
Nashville, TN 37219
clyons@rgrdlaw.com
cwood@rgrdlaw.com

Dennis J. Herman
Willow E. Radcliffe
Kenneth J. Black
ROBBINS GELLER RUDMAN
& DOWD LLP
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
dennish@rgrdlaw.com
willowr@rgrdlaw.com
kennyb@rgrdlaw.com

this 9th day of November, 2020.

/s/ Steven A. Riley